

DONALD JAMES ANSON
PLAINTIFF

V.

DOCKET # 1:07-CV-00035

UNITED STATES OF AMERICA
DEFENDANT

MOTION IN OBJECTION TO DEFENDANT'S
'NOTICE TO PRODUCE'
AND REQUEST FOR SANCTIONS

THE DEFENDANTS SENT TO THE PLAINTIFF A 'NOTICE TO PRODUCE', DATED 1/11/10, WHICH MADE REQUESTS IN (3) THREE AREAS NUMBERED 1, 2, AND 3.

THE PLAINTIFF OBJECTS TO NUMBERS 1, AND 2, FOR THE REASONS LISTED BELOW, AND COMPLIES AS BEST HE CAN NUMBER 3.

WITH REGARD TO NUMBER 1, WHICH STATES IN PART
"COPIES OF ALL STATEMENTS, SIGNED OR OTHER WISE, OF
THE UNITED STATES OF AMERICA, INCLUDING..."

THIS REQUEST FLIES IN THE FACE OF CIV. R. OF PROC. 34 (b) (1) (A)'S REQUIREMENT OF "REASONABLE PARTICULARITY". THE DEFENDANTS PLACE NO LIMITS ON THE STATEMENTS THEY REQUEST. HOW CAN THE PLAINTIFF POSSIBLY PRODUCE "ALL STATEMENTS" MADE BY THE UNITED STATES OF AMERICA?

FURTHER THE DEFENDANTS OFFERED ABSOLUTELY NOTHING TO SHOW ANY RELEVANCY OF "ALL STATEMENTS" TO THIS CASE. SEE HERBST V. ABLE (1972, S.D. N.Y.) 63 FRD 135, CCH FED. SECUR. L. REP. ¶ 93478, (REQUESTER MUST "SHOW THAT DOCUMENTS ARE RELEVANT TO SUBJECT MATTER INVOLVED IN PENDING ACTION"). ALSO MALLINCKRODT CHEMICAL WORKS V. GOLDMAN SACHS + CO. (1973, S.D. N.Y.) 348 FRD 348, CCH FED. SECUR. L. REP. ¶ 93793, 16 FR 527, (DEMAND FOR DOCUMENTS MUST SATISFY REQUIREMENTS OF RELEVANCE UNDER RULE 26 (b) (1) AS INCORPORATED BY REFERENCE IN RULE 34 (a)).

ADDITIONALLY, THE DEFENDANTS DO NOT IN ANY WAY SHOW

THAT ANY PARTICULAR DOCUMENT EXISTS. SEE *CONDRY V. BUCKEYE S.S. CO.* (1947, D.C. PA.) 4 FRD 310 ("UNTIL EXISTENCE OF DOCUMENTS ASKED FOR IS ESTABLISHED AND THEIR MATERIALITY ESTABLISHED, THERE CAN BE NO ORDER TO PRODUCE THEM UNDER THIS RULE").

SINCE THE DEFENDANT'S REQUEST IN NUMBER 1. IS SO OVERBROAD (SEE *UNITED STATES V. INTERNATIONAL BUSINESS MACHINES CORP.* (1976, S.D.N.Y.) 72 FRD 78, 1976-2 CCH TRADE CASES 9161060. 24 FR. SERV. 2d 1156), NO RELEVANCY OR MATERIALITY WAS SHOWN, AND THE EXISTANCE OF ANY PARTICULAR DOCUMENT WAS MADE, THE PLAINTIFF CAN NOT COMPLY AND OBJECTS TO THE REQUEST.

THE PLAINTIFF ALSO ASKS THE COURT TO SEE THIS REQUEST FOR WHAT IT IS, AN ATTEMPT TO HARASS THE PLAINTIFF AND TO OVERTAX WHAT MEGER FINANCES HE HAS ACCESS TO (\$5.25 A MONTH) WITH FRIVOLOUS AND UNREASONABLE PROCEEDINGS WHICH WASTE THE PLAINTIFF'S, AND COURT'S, TIME AND RESOURCES. WITH THE EXPERIENCE AND KNOWLEDGE OF THE U.S. ATTORNEY'S OFFICE (DEFENSE COUNSEL) SUCH AN UNFULFILLABLE REQUEST CAN BE NOTHING BUT A 'BAD FAITH' ABUSE OF THE LEGAL SYSTEM. THE PLAINTIFF THEREFORE ASKS THE COURT TO SANCTION THE DEFENDANTS AND REIMBURSE PLAINTIFF FOR COPY COSTS, POSTAGE AND HIS TIME, AS WELL AS THE COURT'S TIME.

WITH REGARD TO REQUEST, NUMBERED 2. THE PLAINTIFF RAISES THE SAME OBJECTIONS AS TO NUMBER 1. HOW COULD THE DOCTOR'S NAME, WHO REMOVED THE PLAINTIFFS TONSILS OVER 40 YEARS AGO BE MATERIAL TO THIS CASE? YET THE DEFENDANTS EXPECT THE PLAINTIFF, WHO IS INCARCERATED TO PROVIDE, "COPIES OF ALL EXISTING AND FUTURE REPORTS AND RECORDS OF ALL PHYSICIANS AND OR HEALTH CARE PROVIDERS WHO TREATED OR EXAMINED PLAINTIFF PRIOR TO THE DATE OF THE INCIDENT ALLEGED IN THE COMPLAINT. THIS TIME FRAME INCLUDES PRIOR TO THE PLAINTIFF'S BEING INCARCERATED" ('NOTICE TO PRODUCE' PAGE 2 PARC 2).

THIS IS AN IMPOSSIBLE REQUEST WHICH CLEARLY WAS NOT INTENDED TO BE RELEVANT TO THIS CASE BUT WAS AN ATTEMPT TO INTIMADATE THE PLAINTIFF BY MAKING HIM THINK HE WOULD BE FACED BY AN IMPOSSIBLE TASK OR BE IN ~~DEFACT~~ DEFAULT ON HIS CASE. THE DEFENDANTS SHOULD BE AWARE OF PLAINTIFF'S FINANCIAL, AS WELL AS INVESTIGATIONAL, ASSETS FROM THE PRIOR PLEADINGS IN THIS CASE, YET ATTEMPT TO FORCE HIM INTO AN EXPENSIVE AND ULTIMATLY IMPOSSIBLE TASK, HOPING THAT HE WILL, DUE TO LACK OF KNOWLEDGE AND EXPERIENCE, TRY TO FULLFILL THIS TASK AND UPON FAILURE WITHDRAW HIS CLAIM BECAUSE HE JUST CAN NOT CONTINUE THE FIGHT ANY FURTHER. THIS IS A CASE OF BULLYING, PLAIN AND SIMPLE. PLAINTIFF ASKS THE COURT TO REALIZE THIS AND ACT APPROPRIATELY.

WITH REGARD TO NUMBER 3. PLAINTIFF ATTACKES THE ONLY 'PICTURE' HE HAS SO FAR AQUIED AND WILL 'POSTAGE PERMITTING' SEND TO DEFENDANTS ANY SUCH PICTURES HE CAN AQUIRE.

THE PLAINTIFF THEREFORE OBJECTS TO REQUESTS NUMBERED 1. AND 2. AND WILL TRY TO COMPLY WITH NUMBER 3.

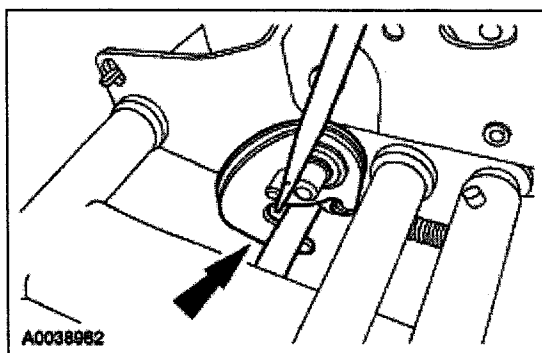
THE PLAINTIFF ALSO ASKS THE COURT TO SANCTION THE DEFENDANTS FOR THEIR MISS-USE OF THE LEGAL SYSTEM.

LASTLY THE PLAINTIFF ASKS THE COURT TO CONSIDER THE 'NOTICE TO PRODUCE' AND THIS REPLY IN ITS CONSIDERATION OF THE 'MOTION TO APPOINT COUNSEL' WRITTEN PRIOR TO PLAINTIFF'S RECEIPT OF THE 'NOTICE TO PRODUCE' AND INCLUDED IN THE SAME MAILING


DATED 1/14/10

1/25/10 → *Daniel*

Daniel



Vehicles with E-Z entry or fold flat seats

5.  **CAUTION:** Do not damage the anti-chuck hook while removing or storing the 40% E-Z entry seat. The weight of the seat should never rest on the anti-chuck hook, as damage to the hook may occur.

Remove the seat.



6. To install, reverse the removal procedure.
7. Check the active restraint system for correct operation. For additional information, refer to Section 501-20A.

GET PHOTO TO SHOW SEAT
 GET VIN# TO SHOW SEAT (REGISTRATION)
 CONTACT FORD MOTOR CO.
 (EXPERT)
 GET OWNER MANUAL (YERR?)
 90-PRESENT

SECTION 501-10: Seating REMOVAL AND INSTALLATION

2001 Expedition/Navigator Workshop Manual

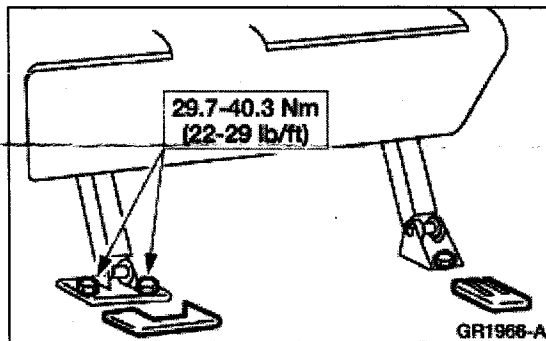
Procedure revision date: 02/26/2004

Rear Seat — Second Row, 40 Percent

Removal and Installation

Vehicles with E-Z entry or fold flat seats

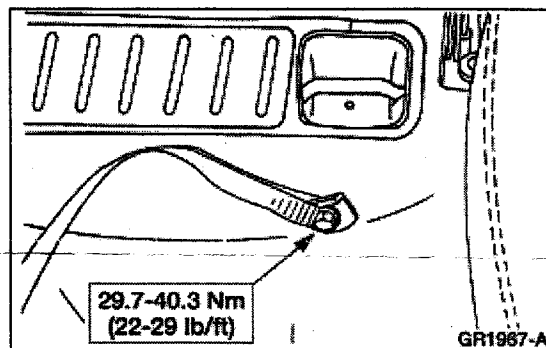
1. Remove the bolt covers and the riser to floor bolts.



2. Fold the seat forward.

Vehicles with E-Z entry seat

3. Remove the seat strap bolt.



Vehicles with fold flat seats

4. Pry the two rear seat latches loose (one shown).